

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

----- X
In re :
 :
 :
 THE FINANCIAL OVERSIGHT AND :
 MANAGEMENT BOARD FOR PUERTO RICO, : PROMESA
 : Title III
 as representative of : Case No. 17-BK-3283 (LTS)
 : (Jointly Administered)
 THE COMMONWEALTH OF PUERTO RICO *et al.*, :
 :
 Debtors.¹ :
----- X

**INFORMATIVE MOTION REGARDING
WITHDRAWAL OF COFINA AGENT’S URGENT MOTION TO
COMPEL THE PUERTO RICO DEPARTMENT OF TREASURY TO
COMPLY WITH THE ORDERS SETTING PROCEDURES FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

To the Honorable United States District Court Judge Laura Taylor Swain:

Bettina M. Whyte (the “**COFINA Agent**”), in her capacity as the appointed agent of the Financial Oversight and Management Board for Puerto Rico (the “**Oversight Board**”), as representative of the Puerto Rico Sales Tax Financing Corporation (“**COFINA**”), respectfully states as follows:

1. On July 16, 2018, the COFINA Agent filed the *Urgent Motion to Compel the Puerto Rico Department of Treasury to Comply with the Orders Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 3544] (the “**Motion**

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“**COFINA**”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“**HTA**”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“**ERS**”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“**PREPA**”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

to Compel”)² and the related motion to expedite the hearing on the Motion to Compel [Docket No. 3546] (the “**Motion to Expedite**”).

2. By order dated July 16, 2018 [Docket No. 3557], the Court granted the Motion to Expedite, setting the hearing on the Motion to Compel for the omnibus hearing scheduled on July 25, 2018.

3. Since the filing of the Motion to Compel, Hacienda has made payment of nearly all of the outstanding fees and expenses of the COFINA Agent Applicants. The COFINA Agent Applicants understand that Hacienda is in the process of making all payments that remain outstanding. Accordingly, the COFINA Agent hereby withdraws the Motion to Compel, without prejudice to the COFINA Agent renewing the Motion to Compel if these remaining payments (or any future payments) are not made by Hacienda.

[The remainder of this page is intentionally left blank]

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion to Compel.

Dated: July 24, 2018
New York, New York

Respectfully submitted,

By: /s/ Joseph G. Minias
Matthew A. Feldman (*pro hac vice*)
Joseph G. Minias (*pro hac vice*)
Antonio Yanez, Jr. (*pro hac vice*)
Martin L. Seidel (*pro hac vice*)
James C. Dugan (*pro hac vice*)
Jeffrey B. Korn (*pro hac vice*)
Paul V. Shalhoub (*pro hac vice*)
WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111
Email: mfeldman@willkie.com
jminias@willkie.com
ayanez@willkie.com
mseidel@willkie.com
jdugan@willkie.com
jkorn@willkie.com
pshalhoub@willkie.com

Counsel to the COFINA Agent

By: /s/ Nilda M. Navarro-Cabrer
Nilda M. Navarro-Cabrer
USDC – PR No. 201212
NAVARRO-CABRER LAW OFFICES
El Centro I, Suite 206
500 Muñoz Rivera Avenue
San Juan, Puerto Rico 00918
Telephone: (787) 764-9595
Facsimile: (787) 765-7575
Email: navarro@navarrolawpr.com

Local Counsel to the COFINA Agent

Kenneth N. Klee (*pro hac vice*)
Daniel J. Bussel (*pro hac vice*)
Jonathan M. Weiss (*pro hac vice*)
KLEE, TUCHIN, BOGDANOFF & STERN LLP
1999 Avenue of the Stars
39th Floor
Los Angeles, California 90067
Telephone: (310) 407-4000
Facsimile: (310) 407-9090
Email: kklee@ktbslaw.com
dbussel@ktbslaw.com
jweiss@ktbslaw.com

*Special Municipal Bankruptcy Counsel
to the COFINA Agent*